

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

JANE DOE #1, and JANE DOE #2, on behalf)
of themselves and all others similarly situated,)
)
Plaintiffs,)
)
v.)
)
MG FREESITES, LTD, d/b/a "PORNHUB",)
a foreign entity; MG FREESITES II LTD, a)
foreign entity; MINDGEEK S.A.R.L., a)
foreign entity; MINDGEEK USA,)
INCORPORATED, a Delaware corporation;)
MG CY HOLDINGS LTD, a foreign entity;)
MINDGEEK CONTENT RT LIMITED, a)
Foreign entity; 9219-1568 QUEBEC INC.)
d/b/a MINDGEEK, a foreign entity; MG)
BILLING LTD, a foreign entity,)
)
Defendants.)
)

**Civil Action No.
7:21-cv-00220-LSC**

DECLARATION OF LOUIS C. BECHTLE ESQ.

I, Louis C. Bechtle, hereby declare and state the following in support of the Motion for Admission *Pro Hac Vice* in the above-captioned matter:

1. I reside at [REDACTED], Audubon, PA 19403.
2. I am an attorney with Conrad O'Brien PC, and my office contact information is as follows:

Louis C. Bechtle
Conrad O'Brien PC
1500 Market Street
Centre Square, West Tower Ste. 3900
Philadelphia, PA 19102-2100
Telephone: 215-864-9600
Facsimile: 215-523-9720
Email: lbechtle@conradobrien.com

3. I have been admitted to the bars of the following courts:

- a. The Supreme Court of Pennsylvania (admitted November 28, 1955);
- b. The Supreme Court of the United States (admitted November 12, 1970);
- c. United States District Court for the Eastern District of Pennsylvania (admitted March 9, 1956);
- d. United States Court of Appeals for the Third Circuit (admitted March 7, 1957).

4. I am in good standing and eligible to practice law before all of the courts to which I have been admitted.

5. I served as a United States District Court Judge for the United States District Court for the Eastern District of Pennsylvania from March 7, 1972 until April 30, 1993, at which time I assumed senior status. I served as a Senior United States District Court Judge until June 30, 2001.

6. In the above-captioned matter, I will represent my clients as co-counsel along with the following local members of the bar of this Court:

Gregory Zarzaur (ASB-0759-E45Z)
THE ZARZAUR LAW FIRM
2332 Second Avenue North
Birmingham, Alabama 35203
T: (205) 983-7985
E: gregory@zarzaur.com

Joshua P. Hayes (ASB-4868-H68H)
PRINCE GLOVER HAYES
701 Rice Mine Road
Tuscaloosa, Alabama 35406
T: (205) 345-1234
E: jhayes@princelaw.net

6. I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Respectfully submitted,

Dated: February 25, 2021

/s/ Louis C. Bechtle
Louis C. Bechtle